

# Hopi Telecommunications, Inc. Application for the FCC's Broadband Adoption Lifeline Pilot Program

WC Docket No. 11-42











#### **History and Mission**

For many years, the Hopi Tribe struggled with inadequate telecommunications services on the Hopi Reservation. Prior to Hopi Telecommunications, Inc. (HTI) providing telecommunications services, the network was operated and maintained by a non-Tribal entity and lacked many of the basic features and capabilities that are taken for granted in most other parts of the country. Many Tribal residents lived without phone service because the network was not available in their location.

The Hopi Reservation is situated inside a much larger Indian Reservation and the nearest town with amenities for basic and low cost sustenance is about two hours drive. The Hopi Reservation economy consists of high unemployment and limited sustainable employment opportunities and primarily consists of the sale of Hopi Arts and Crafts to tourist in route to other locations, a market too narrow and seasonal. Furthermore, the Tribe's economy does not include revenues from "gaming" operations to inject into the Hopi communities.

On April 9, 2004, the Hopi Tribal Council established HTI under its own regulations and therefore wholly owned by the Tribe, a Tribal Chartered Corporation. The mission of HTI is to provide better quality telecommunications services to the Hopi Reservation, to create a sustainable business that provides jobs to Tribal Members, to provide a telecommunications infrastructure that promotes economic and social development, and to promote Tribal sovereignty through empowerment, self-sufficiency, and self-regulation.

On June 1, 2006, HTI started operations with an antiquated telecommunications system purchased from the prior telephone service provider. HTI immediately engaged in building out and upgrading its telecommunications infrastructure with a state of the art softswitch replacing a legacy DMS 10, broadband loop carrier equipment, an OC3 radio replacing a DS3 radio to connect to the "outside world", replacing copper cable with fiber optic cable and extending telephone services to our customers. In 2008 HTI offered its first DSL high speed internet connectivity. HTI also received an ARRA award and is currently building a fiber optic cable route from the Hopi Reservation to a nearby town outside the Hopi Reservation to connect to the "outside world" effectively replacing the OC3 radio. Moreover, HTI is constantly seeking to provide quality, reliable and affordable telecommunications services to its customers.

Today's education, healthcare, and commerce environments require greater and high speed telecommunications systems to enable efficient interaction at the local, regional and worldwide levels. The previous network made it difficult for the Hopi People to compete in and with the rest of the world in these areas.

HTI has grown significantly in the few years it has been in operation and has become an integral partner in the Hopi community. It is our commitment to share and return to the Hopi community our achievements and successes by contributing to local events such as, school programs, youth and elderly programs, health education programs and others.

It is a strong belief of HTI that the Broadband Pilot Program is a viable future solution to assist the Hopi People experience and gain the benefits of modern technology, to become valuable contributors to their communities and more importantly to help reach a desired quality of life.

#### I. (A) Names and identifiers used by the ETC applying for Pilot Funding

#### **Operating Company and Holding Company:**

Operating Company - Hopi Telecommunications, Inc. (HTI)

Hopi Telecommunications, Inc. is a wholly-owned Tribal Corporation. The Hopi Tribe owns 100% of the stock of Hopi Telecommunications, Inc. We do not have a holding company.

#### Affiliates:

Little Star Communications, Inc.

#### **FCC Registration Number (FRN):**

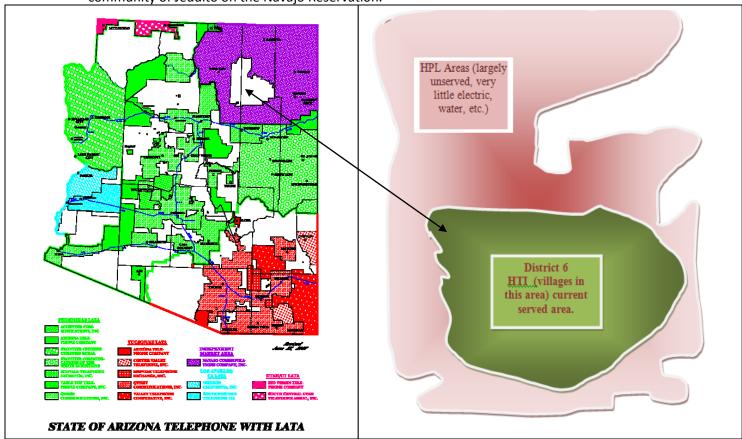
Hopi Telecommunications, Inc. - 14295679

#### Study Area Code (SAC):

Hopi Telecommunications, Inc. - 450815

#### States where ETC is currently designated to provide Lifeline service:

Hopi Telecommunications, Inc. is designated to provide Lifeline service in the state of Arizona. The serving area includes the Hopi Reservation (excluding the community of Moenkopi), and the community of Jeddito on the Navajo Reservation.



#### (B) A full description of the proposed pilot project

 The geographic area(s) in which the ETC will offer the broadband plan(s) for their project, census data on the income levels of the residents of the specified geographic area(s), and whether the geographic area(s) will cover Tribal Lands.

HTI's serving area includes over 2,400 square miles in Navajo County, AZ. Income levels in our serving area are outlined below:

Hopi Reservation and Trust Lands			<u>United States</u>		
	Estimate	Percent		Estimate	Percent
Total Households	2,223		<b>Total Households</b>	114,567,419	
Less than \$10,000	372	16.7%	Less than \$10,000	8,757,190	7.6%
\$10,000 to \$14,999	108	4.9%	\$10,000 to \$14,999	6,668,865	5.8%
\$15,000 to \$24,999	292	13.1%	\$15,000 to \$24,999	13,165,380	11.5%
\$25,000 to \$34,999	406	18.3%	\$25,000 to \$34,999	12,323,322	10.8%
\$35,000 to \$49,999	392	17.6%	\$35,000 to \$49,999	16,312,385	14.2%
\$50,000 to 74,999	372	16.7%	\$50,000 to 74,999	20,940,859	18.3%
\$75,000 to \$99,999	171	7.7%	\$75,000 to \$99,999	13,526,500	11.8%
\$100,000 to \$149,999	94	4.2%	\$100,000 to \$149,999	13,544,839	11.8%
\$150,000 to \$199,999	-	0.0%	\$150,000 to \$199,999	4,809,998	4.2%
\$200,000 or more	16	0.7%	\$200,000 or more	4,518,081	3.9%
Per Capita income (dollars) \$11,		\$11,753	Per Capita income (dollars)		\$26,059

As demonstrated in the table above, 53% of Hopi households have less than \$35,000 in annual income and benefits as compared with the rest of the United States (36%) according to the U.S. Census Bureau's American Community Survey. Sixteen percent of our community households have less than \$10,000 in annual income and benefits. Clearly, our community is vulnerable and would make good use of the Pilot funds.

HTI's entire serving area is comprised of Tribal Lands.

2. A description of the technology or technologies that will be used for the broadband service.

HTI will use ADSL2+ technology fed from our OCCAM access points which are currently fed using fiber optic backhaul.

#### 3. The broadband speeds for the service offering(s) based on what is advertised by the ETC:

HTI has the current ADSL service offerings\*\*:

All upload speeds are 256k, speeds indicated below are for download:

Plan 1	256 k	\$29.95 per month	\$150 installation / \$90 modem fee
Plan 2	768 k	\$49.95 per month	\$90 modem fee
Plan 3	1.5 Meg	\$59.95 per month	\$90 modem fee
Plan 4	3 Meg	\$69.95 per month	\$90 modem fee

<sup>\*\*</sup>HTI's Pilot will only offer Plan 3 and Plan 4 as described below in number 4.

### If the offered speed is less than the benchmarks identified by the Commission an explanation of why the speed is less than the benchmarks

In 2006, when HTI purchased the existing three exchanges from CenturyTel, the existing infrastructure did not include broadband capable facilities. The plant included practically zero percent fiber and the microwave transport system was antiquated and exhausted. Much of the copper plant was exposed, and as a result, HTI had to upgrade and add to the existing telecommunications plant in order to offer broadband to our community.

HTI replaced the existing analog carrier and pair gain equipment that had no broadband capabilities with fiber fed Broadband Loop Carrier equipment in order to offer DSL to almost all of our subscribers. HTI used RUS loan funds to install fiber routes between exchanges and to equipment sites. We began offering broadband to our community in October 2008; however, we are currently limited to the 3Meg plan due to cost and capacity.

Only 17% of our current residential broadband subscribers, and 61% of our business broadband subscribers are on the 3Meg plan (fastest available) At the current rate structure, our community cannot afford the 3Meg plan, so the reasonable assumption is that they would also not be able to afford the rates we would be forced to charge for higher speeds.

HTI secured a combination loan/grant through the American Recovery and Reinvestment Act to build out infrastructure and provide necessary equipment to establish the first fiber-optic connection between the Hopi Reservation and the world. We will build 61 miles of fiber-optics between the community of Jeddito and Holbrook to create reliable and high speed connectivity to all of HTI's subscribers. This project will effectively replace the current microwave system as our primary connection and should be complete by the end of 2013. At that time, we will be in a position to offer faster speeds at more competitive prices, and will add more choices for our community.

How the speed offered will provide consumers access to key applications involving education, healthcare and person-to-person communications:

HTI will include Plan 3 and Plan 4 in our Pilot program. Plans 1 and 2 are made available so that a greater percentage of our community is able to afford the service, but we do not believe the speeds are sufficient for meaningful use of the Internet.

The speeds offered under Plan 3 and Plan 4 will help Hopi Tribal participants experience the educational, healthcare, and social benefits associated with access to high-speed internet. Examples of the benefits are described below.

#### Education

According to the FCC's National Broadband Plan, "Broadband can be an important tool to help educators, parents and students meet major challenges in education." High-speed internet in the home can help tribal communities, which suffer from the same barriers as rural communities, further overcome the educational divide that exists between rural areas and their urban and suburban counterparts. Through high-speed internet access, rural students have access to classes that may otherwise not be offered in their schools, such as Advance Placement and International Baccalaureate classes. Since education does not conclude with when the school bell rings, high-speed internet at home is vital for tribal students to take full advantage of their educational opportunities. Moreover, high-speed internet at home allows parents further to engage in their children's education by participating in groups for gifted and special needs students.

#### Healthcare

The Pew Charitable Trusts, through the Pew Internet & American Lifeline Project, has conducted extensive research on how the internet affects the daily lives of Americans. In The Social Life of Health Information, 2011 survey, Pew found that 80% of adults that use the internet, or 59% of all American adults, use the internet to research diseases and treatments online. Further, 24% of adult internet users with chronic health conditions (e.g., high blood pressure, cancer, diabetes) seek out other internet users with similar health conditions according to Pew. The ability to research health topics and seek virtual support from others who may have similar medical histories is especially helpful in tribal areas where access to healthcare and support groups is not readily available. Moreover, access to the internet allows users to take ownership of his or her own healthcare by tracking health data online. Specifically, the ability to track ones diet, weight, and exercise online could have significant health benefits in a community plagued by diabetes and obesity.

#### **Social Benefits**

In 2010, 19% of American adults made video calls either online or through their wireless phones, according to Pew's <u>Video Calling and Video Chat</u> report. The ability to make video calls allows individuals see loved ones whom they may not otherwise get to visit. This is especially important in the senior community, where homebound seniors may feel isolated and lonesome.

## 4. The amount of the monthly discount, if any, the ETC is seeking for each broadband plan included within the proposed project and the resulting cost to subscribers for the broadband service:

<b>Broadband Plan</b>	HTI Advertised Pricing	Pilot Discount	Cost to Subscriber
Plan 3 – 1.5Mbps	\$59.95 per month	\$49.95	\$10.00
Plan 4 – 3.0Mbps	\$69.95 per month	\$49.95	\$20.00

HTI believes that when implemented, the Broadband Lifeline program should include higher support for services provided on Tribal Lands. Penetration rates are lower on Tribal Lands than in other parts of the country, and HTI believes that an Enhanced Tribal Broadband discount should be considered (similar to the approach taken for basic telephone service support).

Some of the participants in the Pilot Program will receive access to a refurbished computer financed through HTI over 6 months. The computers will be purchased by HTI through a partner, Connected Nation (discussed further in number 8).

HTI will seek qualified participants for the program and randomly assign interested parties into one of four groups:

<u>Group One</u> will be offered a low-cost refurbished computer financed through HTI over 6 months with no recurring monthly discount for the Broadband Plans. This group will help us determine whether or not it is access to hardware that prevents broadband adoption.

**Group Two** will be offered Plan 3 at a monthly recurring cost of \$10.00 and the option of receiving a low-cost refurbished computer financed through HTI over 6 months.

**Group Three** will be offered Plan 4 at a monthly recurring cost of \$20.00 and the option of receiving a low-cost refurbished computer financed through HTI over 6 months.

<u>Group Four</u> will be offered a "choice" of one of the discounted broadband plans, but will not have access to the low-cost financed computers. Given that most of our consumers take our current Plans 2 or 3, our assumption is that price (not speed) is the primary factor when deciding what Plan they will subscribe to. We predict that this Group will not have many participants given they are not in a group for which they can get access to a low-cost computer.

HTI strongly believes that the reasons for low Broadband penetration among low-income consumers on Tribal Lands is a combination of the recurring fees, access to credit to purchase hardware/software, the cost of the hardware, and the recurring fees associated with Internet access. If we create a program that includes support for one or more of the above barriers, we will be able to gather high-quality data that will help identify effective approaches to increasing broadband adoption and retention among low-income consumers.

There will be no bundled Broadband Pilot offerings and all participants must already subscribe to basic Lifeline telephone service.

5. The amount, if any, of a subsidy the ETC is seeking to reduce or eliminate any non-recurring fees, and explanation of the costs the non-recurring fees are used to cover and the resulting cost to subscribers of any non-recurring fees:

HTI does not customarily charge any service order or installation fees to our non-Lifeline Broadband customers on the proposed broadband plans; accordingly, it would not be appropriate to seek any non-recurring reimbursements from the Pilot Program.

6. A detailed explanation of how the proposed pilot project will focus on those low-income consumers who do not currently subscribe to broadband:

Seventy-eight percent of our residential access lines are billed as Lifeline accounts. While our broadband penetration on a company level is 40%, the Lifeline customers who are also subscribers of broadband is only 34%. HTI will only offer participation in the Broadband Pilot to those Lifeline consumers who are not currently subscribed to one of our Broadband plans. Our billing system is capable of many different queries, and as a result, the task of identifying eligible consumers will be extremely efficient. Today, there are 631 HTI customers who would be eligible to participate in the Pilot.

7. The project's proposed overall funding amount with details on the number of customers it is estimated to serve, with underlying assumptions:

If our pool of participants is 631, and we have participation at 100% HTI believes its project will have a maximum funding amount of \$283,515 as outlined below:

	Pilot Discount			<b>Total Program Cost</b>
Group	Amount	<b>Participants</b>	Monthly	(12 months)
Group One	\$ 0.00	158	\$0.00	\$0.00
Group Two	\$49.95	158	\$7,892	\$94,705
Group Three	\$49.95	158	\$7,892	\$94,705
Group Four	\$49.95	157	\$7,842	\$94,105
		<u>631</u>	\$23,676	\$283,515

8. A description of how the ETC will market the broadband service offering(s) to low-income consumers (e.g., outreach to existing Lifeline voice subscribers, advertising in newspapers/radio, outreach through community-based organizations), the language(s) in which the ETC will market the service and copies of sample marketing materials if available:

HTI will market the Pilot service offerings by reaching out to eligible consumers in the following ways:

- Public Service Announcements on KUYI, Hopi Radio. www.kuyi.net
- Advertisements in the Hopi newspaper, The Hopi Tutuveni
- Direct community outreach at Village meetings
- Flyers announcing program placed in all community centers
- Display in our Customer Service Office (most customers pay their bills in person)
- Bill inserts or direct mailing
- Informational booths at community events

All marketing materials will be in English and we will provide Hopi/Navajo translators when necessary.

## 9. A description of what customer service support will be available to subscribers participating in the pilot project:

HTI offers 24/7 email support through Neonova Networks. www.neonova.net

HTI has technicians on call 24/7 to address trouble calls and will respond within two hours to troubleshoot any broadband network issues.

#### (C) A detailed explanation of how the ETC's project will address barriers to broadband adoption:

#### 1. Whether the ETC's project will provide digital literacy training and what form that will take:

HTI will partner with Connected Nation (CN) to provide Digital Literacy Training. The proposed steps include:

- Understanding the Community CN will review available statistics and rely on past Tribal outreach experience to customize the training. HTI will provide insights that will be beneficial in understanding specific digital literacy needs within the Hopi community.
- 2. Scope of the Training Plan entails digital literacy training for up to 120 people. The training will be available on a first-come, first-served basis and will only be available to customers participating in the broadband pilot. Training for each group will take place over 2 days.
- 3. Determine Training Needs CN will develop an outline of specific training needs of the local community to include class objective, core competencies, curriculum, training modules, and instructor guides.
- 4. Training Facility HTI will secure a facility which will be easily accessible to program participants. HTI will set up and configure computers for the training session. HTI will provide technical support to help with any technical issues encountered during the training. HTI will purchase the 20 refurbished laptops for the training.
- 5. Instructors CN will provide two professional instructors for all sessions. One instructor will focus primarily on leading the trainees while the other instructor supports and provides individual attention to trainees as needed. Both instructors will be experienced in digital literacy training and working with relevant applications. Both instructors will be responsible for keeping participants engaged, maintaining professional presence, opening and closing training sessions, correlating the training to real-world business and personal applications.
- 6. Confirm Training Logistics HTI will confirm class size, dates and times, IT requirements and schedule classes. CN will ensure instructors are assigned, prepared, and present for classes as scheduled. CN will ensure all training modules are finalized and trainee resources (handouts, notebooks, etc.) are printed and ready for distribution.
- 7. Outreach and Awareness HTI will develop and implement outreach strategies that are appropriate for the target population.

2. Whether the project will provide free or discounted hardware, including aircards, modems, laptops (notebooks), tablets, desktops, or other mobile devices, to the subscribers; who will supply and pay for the free or discounted hardware; whether the subscribers will bear any cost of the discounted hardware; and the cost the ETC will require the subscriber to pay:

HTI believes that the cost of a computer, and lack of access to credit, can be significant barriers to broadband adoption. Through our project partner, Connected Nation <a href="https://www.connectednation.org">www.connectednation.org</a>, HTI plans to offer refurbished desktop and laptop computers to participants in our program. HTI will purchase the computers through Connected Nation and help our customers finance them through a monthly payment plan.

HTI will charge the customer its cost in the computer. HTI has been offered a price of \$119.99 plus shipping of \$12.00 for Desktops, and \$189.99 plus \$12.00 shipping and handling for laptops. Descriptions of the computers are below:

**Desktop 1D** - \$119.99 plus \$12.00 shipping **Basic Desktop Internet Access Computer – Windows XP**Pentium 4 Processor, 1GB RAM; 40GB Hard Drive, DVD Drive Includes Windows XP and 15" Display Monitor with cable

**Laptop 1C** - \$189.99 plus \$12.00 shipping **Basic Portable Internet Access Computer – Windows XP**Pentium 4 Processor, 1 GB RAM; 40GB Hard Drive, DVD Drive Includes Windows XP Operating Software, with Wireless capability

All computers include a 90 day warranty.

The requirement to receive a financed computer will be that the participant fall into one of the three program groups that includes access to a computer, they make a down payment of \$50, and pay the balance over 6 months.

(D) The name and description of the qualifications of any individuals or entities the ETC proposes to partner with in designing or implementing the proposed pilot project, and a detailed explanation of the role of the partner(s), if any, including whether they have existing or planned adoption efforts that provide for a more holistic approach to overcoming broadband adoption barriers, including digital literacy, equipment cost, and relevance:

HTI's primary partner in this project is Connected Nation. From its website:

Connected Nation has been committed to provide extensive broadband planning services for communities and states for more than ten years. These services ranging from comprehensive broadband mapping to public policy language. Connected Nation has a number of services to serve communities and its citizens.

Connected Nation's Core Services: Digital Literacy, Research & Analysis, Policy Consultation and Mapping.

Please see their website for more information. <a href="www.connectednation.org">www.connectednation.org</a>

#### (E) A detailed explanation of the design, data gathering and evaluation component of the project:

- 1. HTI is not conducting a field experiment. However, HTI understands that in order for this project to properly evaluate which variables best affect broadband adoption, it must offer different variables to its customers to determine which work best for the Hopi Community and which do not work for the Hopi Community. Our sample size is sufficient as we will target 100% of the subscribers of voice Lifeline who do not currently subscribe to one of our DSL offerings. We will randomly assign participants to a group using either the Excel feature, or drawing a number from a hat.
- 2. HTI will collect the required data and will not rely on USAC. Our customers are unique and personal guidance may be necessary to ensure complete surveys are submitted. HTI has been extremely successful in its Lifeline outreach efforts. The approach to collect data from our subscribers for this project will be similar to Lifeline recertification efforts. First, we mail the request, follow up with phone calls, and in some cases, make personal appointments to explain our request. In addition, the participants will be new broadband subscribers and may not be familiar with online surveys.
- 3. HTI does not plan to collect additional data from its subscribers at this time.
- (F) A detailed explanation of how the ETC will comply with the Commission's new rules relating to determinations of subscriber eligibility for Lifeline-supported services by applying all of the consumer eligibility and enrollment procedures as detailed in section VI and Appendix C of the Lifeline Reform Order and FNPRM, and a copy of the ETC's certification form for enrollment that will be used during the Pilot Program:

HTI has revised all of its Lifeline forms in response to the Lifeline Reform Order. In the event our application is accepted for the pilot program, we will use an identical certification form and simply add language in the title to specify Broadband Pilot. HTI also provides the customer with a Household Worksheet under the voice program to ensure they understand the "one per household" rule. The forms HTI has approved for voice Lifeline subscribers are included in Appendix A.

(G) A description of how the ETC will transition its broadband subscribers at the conclusion of the ETC's project once the discount has ended and any copies of any notices the ETC would send to its subscribers explaining this transition:

HTI plans to have a close relationship with its project participants. The pilot goals and time period will be carefully explained to all subscribers. HTI fully intends to have our fiber route completed by the end 2013, and at that time we should be able to revise our offerings and offer higher speeds at lower rates. For that reason, we will not create any notices at this time, and will wait until we have reliable, timely information to share about the plans that will be available at the end of the pilot. HTI will gladly share this information with the Commission once it has a better idea of its new service offerings and rates.

(H) If the ETC and its partners intend to submit a final report to supplement the information collected on the Low-Income Broadband Pilot Program Reporting Form, a general description of the types of analysis that will be included in the final report submitted to the Commission at the end of the program. The description should include hypotheses tested and how the analysis addresses the goal of identifying effective approaches to increasing low-income broadband adoption and retention. The description may also explain how, once the study is complete, the costs of converting a non-adopter to adopter will be calculated and presented in the report:

HTI will submit a final report at the conclusion of the pilot program. In addition to an analysis of the required quantitative data collected by HTI, the final report will include a qualitative analysis of how access to affordable high-speed broadband affected low-income members of the Hopi Tribe. Although qualitative findings cannot be extrapolated to an entire population, HTI hopes that they can serve as a useful resource for the Commission as it develops a permanent broadband Lifeline component. The final report will also share challenges and benefits experienced by HTI, the effect of the subsidy's termination on broadband retention, and other information that HTI deems relevant.

(II) All required certifications are included in Appendix B.

## **APPENDIX A**

#### HOPI TELECOMMUNICATIONS, INC. LIFELINE INITIAL ENROLLMENT FORM

Lifeline is a federal benefit that makes monthly telephone service more affordable for eligible households. Your household may receive Lifeline on one wireless OR one home telephone, but not both. Your household may not receive the Lifeline benefit from more than one telephone company. For the purpose of Lifeline, a household is an individual or any group of individuals who live together at the same address and share income or expenses. You may not transfer your Lifeline discount to another person, even if he or she is eligible. You may lose your Lifeline benefit and may be prosecuted by the United States government if you violate the one-per-household rule or otherwise make false statements to receive Lifeline.

Please complete the form below. You must give proof of eligibility with your application. Send the completed the form and proof of eligibility to: PO Box 125 Keams Canyon, AZ 86034 FAX: 928-738-0097

Applicant Name		Pho	one Number		
Date of Birth	Last 4 digits of	SSN	[	Permanent /	Address?
Residential Addres	s		l	CYes	□No
(No PO Box)	Street	Apt.	State	Zip Cı	ode
Billing Address (If applicable)	Street	Apt.	State	Zíp Ci	ode
Initial here	I give Hopi Telecommunications, Inc. permission to Universal Service Administrative Company (USAC) o Lifeline benefit. If USAC finds that my household re telephone companies, and I will have to select one	r its agent to confi ceives more than o	rm that my h one Lifeline b	ousehold only enefit, USAC w	receives one ill notify the
Di certify that I, my dependent, or someone else in my household receives assistance from at least one of the programs listed below and that I have provided proof of eligibility with my application. (Please check all that apply)  I Bureau of Indian Affairs General Assistance Federal Public Housing Assistance/Section 8 Medicaid   Head Start (income eligible) Low Income Home Energy Assistance Program National School Lunch free lunch program Supplemental Security Income (SSI) Supplemental Nutrition Assistance Program (Food Stamps)  Temporary Assistance for Needy Families (TANF) = Tribal TANF Name of eligible person Relationship to applicant					
Federal Poverty Guidelines Size Income Size Income					Total Income
Number of people	in your household	2	\$15,080 \$20,426	3	\$25,772 \$31,118
Number of people	jour nousenous	Add \$5,346 for ea	. ,	_	<b>\$32,220</b>
I certify, under penalty of perjury, that:    I live on federal- recognized Tribal lands.   My household receives only one Lifeline-supported service, and to the best of my knowledge, no one in my household receives Lifeline from another telephone company.   I understand that I must notify Hopi Telecommunications, Inc. within 30 days:   (1) if I move to a new address;   (2) if I, or the eligible person in my household, stops participating in the qualifying program checked above, or if my household income exceeds 135% of the federal poverty guidelines;   3) if my household receives more than one Lifeline discounted telephone; or   4) if my household, for any reason, no longer meets the criteria to receive Lifeline support.   I understand that I may be penalized for failing to make the above notifications.  By signing below, I certify under penalty of perjury, that the above information is true to the best of my knowledge. I understand that Lifeline is a government program and I may be punished if I knowingly provide false or untrue information to receive Lifeline Punishment may include being fined, imprisoned, or barred from the Lifeline program.  Signature   Date   D					
I	understand that I must recertify my Lifeline eligibility not recertify each year.	every year and the	at I will lose I	my Lifeline ber	efit if I do
For Office Use Only	y: Type of documentation reviewed Income Reviewed by:	Lifeline H	Program	n orksheet? Ye	s INO

#### HOPI TELECOMMUNICATIONS, INC. LIFELINE ANNUAL RECERTIFICATION FORM

Every year, you must certify that your household still qualifies for the Lifeline benefit. If you do not return this form within 30 days, you will lose your Lifeline benefit. Send completed form to: PO Box 125 Kearns Canyon, AZ 86034 FAX: 928-738-0097

TO KEEP YOUR LIFELINE BENEFIT\*, FILL OUT THE FORM BELOW AND RETURN IT BY

Applicant Name Permanent Address? Last 4 digits of SSN Date of Birth Yes I No Residential **∆ddress** Street State Zip Code Billing Address (If applicable) Street Apt. State Zip Code □ certify that I, my dependent, or someone else in my household receives assistance from at least one of the programs listed below. (Please check all that apply) I IBureau of Indian Affairs General Assistance Federal Public Housing Assistance/Section 8 Medicaid | Head Start (income eligible) Low Income Home Energy Assistance Program National School Lunch free lunch program I Supplemental Security Income (SSI) Supplemental Nutrition Assistance Program (Food Stamps) Temporary Assistance for Needy Families (TANF) Tribal TANF Name of eligible person Relationship to applicant Total I IOR, I certify that my household income is at or below 135% of the Household Household Total Size Federal Poverty Guidelines Size Income Income \$15,080 1 3 \$25,772 \$31,118 Number of people in your household \$20,426 Add \$5,346 for each additional person Initial each box I certify, under penalty of perjury, that: I live on federal-recognized Tribal lands. My household receives only one Lifeline-supported service, and to the best of my knowledge, no one in my household receives Lifeline from another telephone company. I understand that I must notify HOPI TELECOMMUNICTIONS, INC. within 30 days: (1)if I move to a new address: (2) if I, or the eligible person in my household, stops participating in the qualifying program checked above, or if my household income exceeds 135% of the federal poverty guidelines; 3) if my household receives more than one Lifeline discounted telephone; or 4) if my household, for any reason, no longer meets the criteria to receive Lifeline support. I understand that I may be penalized for failing to make the above notifications. I give HOPI TELECOMMUNICATIONS, INC. permission to give my name, telephone number, and address to the Universal Service Administrative Company (USAC) or its agent to confirm that my household only receives one Lifeline benefit. If USAC finds that my household is receiving more than one Lifeline benefit, USAC will notify the telephone companies, and I will have to select one service and I will be de-enrolled from the other. I give HOPI TELECOMMUNICATIONS, INC. permission to access any records necessary to verify my continued Lifeline eligibility. I understand that I must recertify my Lifeline eligibility each year and that I will lose my Lifeline benefit if I do not recertify every year. By signing below, I certify under penalty of perjury, that the above information is true to the best of my knowledge. I understand that Lifeline is a government program and I may be punished if I knowingly provide false or untrue information to receive Lifeline. Punishment may include being fined, imprisoned, or barred from the Lifeline program. Signature Date "Lifeline is a federal benefit that makes monthly telephone service more affordable for eligible households. Your household may receive Lifeline on one wireless OR one home telephone. Your household may not receive the Lifeline benefit from more than one Telephone company. For the purpose of Lifeline, a household is an individual or any group of individuals who live together at the same address and share income or expenses. You may not transfer your Lifeline discount to another person, even if he or she is eligible. You may lose your Lifeline benefit and may be prosecuted by the United States government if you violate the one-per-household rule or otherwise make false statements to receive Lifeline. \_\_ Database queried? N/A No Yes, Database Name For Office Use Only: Reviewed by:\_ Date reviewed or queried Lifeline Household Worksheet? | Yes No This form was created in accordance with the FCC's Lifeline rules by John Staurulakis. Inc.® Revised 05.21.2012

#### HOPI TELECOMMUNICATIONS, INC. Lifeline Household Worksheet

	Name						
	Address						
	Telephone Number						
		that provides a monthly discount on home or mobile telephone services. Only ONE Lifeline discount is allowed per household. permitted to receive Lifeline service from multiple telephone companies.					
Your	household is everyone who i	ives together at your address as one economic unit (including children and people who are not related to you).					
of ag (suct and e	The adults you live with are part of your economic unit if they contribute to and share in the income and expenses of the household. An adult is any person 18 years of age or older, or an emancipated minor (a person under age 18 who is legally considered to be an adult). Household expenses include food, health care expenses (such as medical bits) and the cost of renting or paying a mortgage on your place of residence (a house or apartment, for example) and utilities (including water, heat and electricity). Income includes salary, public assistance benefits, social security payments, pensions, unemployment compensation, veteran's benefits, inheritances, alimony, child support payments, worker's compensation benefits, gifts, and lottery winnings.						
to be	part of the same household	e considered to be part of the same household. Children under the age of 18 living with their parents or guardians are considered as their parents or guardians. If an adult has no income, or minimal income, and lives with someone who provides financial support sidered part of the same household.					
othe		lete this Worksheet because someone else currently receives a Lifeline-supported service at your address. This be a part of your household. Answer the questions below to determine whether there is more than one household					
		<ol> <li>Does your spouse or domestic partner (that is, someone you are married to or in a relationship with) already receive a Lifeline-discounted phone? (check no if you do not have a spouse or partner)YESNO</li> </ol>					
		If you checked YES, you may not sign up for Lifeline because someone in your household already receives Lifeline. Only ONE Lifeline discount is allowed per household.					
		If you checked NO, please answer question #2.					
	2. Other than a spouse	2. Other than a spouse or partner, do other adults (people over the age of 18 or emancipated minors) live with you at your address?					
	A. A parent	YES NO D. An adult roommate YES NO					
	B. An adult son or daug						
	<li>C. Another adult relative sibling, aunt, cousin, grandchild, etc.)</li>	· <u> </u>					
	•	If you checked NO for each statement above, you do not need to answer the remaining questions. Please initial line B, below, and sign and date the worksheet.					
	<ul><li>If you checked YES, p</li></ul>	olease answer question #3.					
		<ol> <li>Do you share living expenses (bills, food, etc.) and share income (either your income, the other person's income or both incomes together) with at least one of the adults listed above in question #2?YESNO</li> </ol>					
	<ul> <li>If you checked NO, to worksheet.</li> </ul>	If you checked NO, then your address includes more than one household. Please initial lines A and B below, and sign and date the worksheet.					
		then your address includes only one household. You may not sign up for Lifeline because someone in your household					
CER	already receives Life TIFICATION	inc.					
	Please initial the certifications below and sign and date this worksheet. Submit this worksheet to [insert company						
	gency name] along with yo	<u> </u>					
	A.	live at an address occupied by multiple households.					

I understand that violation of the one-per-household requirement is against the Federal Communication Commission's rules and

may result in me losing my Lifeline benefits, and potentially, prosecution by the United States government.

## **APPENDIX B**

#### Certifications by an officer of the ETC under penalty of perjury:

I, Carroll Onsae, an officer of Hopi Telecommunications, Inc. ("Hopi") with substantial knowledge of Hopi's operations, do hereby certify under penalty of perjury that the following statements are accurate to the best of my knowledge and belief:

- (A) Hopi intends to offer broadband service pursuant to the Commission's rules and regulations for the Lifeline program;
- (B) Hopi will implement all necessary procedures and efforts to prevent waste, fraud and abuse in connection with its participation in the Pilot Program, including but not limited to procedures that Hopi will have in place to prevent duplicate broadband subsidies within its subscriber base, and procedures to de-enroll subscribers receiving more than one broadband discount per household;
- (C) Hopi 's broadband service offering(s) will provide sufficiently low latency to enable use of real-time applications such as Voice over Internet Protocol (VOIP) and if there are usage limits for each plan, that they are reasonably comparable to usage limits for comparable broadband offerings in urban areas; and
- **(D)** Hopi will participate in the collection and sharing of anonymized qualitative and quantitative data with standard data elements, formatting, and submission requirements, and that Hopi will participate in workshops to discuss interim and final results of the project, and how best to use limited universal service funds to increase low-income consumers' adoption of broadband resources.

Respectfully Submitted,

Mr. Carroll Onsae

President and General Manager

July 9, 2012